

1 STEPHANIE M. HINDS (CABN 154284)
Acting United States Attorney

2 HALLIE HOFFMAN (CABN 210020)
3 Chief, Criminal Division

4 MAIA T. PEREZ (MABN 672328)
Assistant United States Attorney

5 150 Almaden Boulevard, Suite 900
6 San Jose, California 95113
7 Telephone: (408) 535-5061
8 FAX: (408) 535-5066
maia.perez@usdoj.gov

9 Attorneys for United States of America

10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 SAN JOSE DIVISION
13

14 UNITED STATES OF AMERICA,) NO. CR 19-00416 BLF
15 Plaintiff,) STIPULATION AND REQUEST FOR
16 v.) RESTITUTION ORDER
17 JACQUELINE DUONG,)
18 Defendant.)

19
20 I, Jacqueline Duong, and the United States Attorney's Office for the Northern District of
21 California (hereafter "the government") enter into this stipulation (the "Stipulation") and jointly request
22 the Court enter an Order of restitution in accordance with the following terms at sentencing on June 1,
23 2021.

24 The United States and defendant Jacqueline Duong, by and through their respective counsel,
25 hereby stipulate and agree as follows:

26 1. In the Plea Agreement entered on January 26, 2021, defendant Duong agreed to pay
27 restitution of no less than \$279,513.02 and no more than \$444,873.00. ECF 32.

2. The parties stipulate and agree that defendant Duong should pay restitution of \$407,454.00 to the United States.

3. The parties therefore jointly request that the Court issue an Order of restitution in the amount of \$407,454.00 at sentencing on June 1, 2021.

4. Defendant Duong confirms that she has had adequate time to discuss this Stipulation with her attorney and that her attorney has provided her with all the legal advice that she requested.

5. Defendant Duong confirms that while she considered signing this Stipulation, and at the time she signed it, she was not under the influence of any alcohol, drug, or medicine that would impair her ability to understand the Stipulation.

IT IS SO STIPULATED.

Dated: 6/1/2021



JACQUELINE DUONG
Defendant

STEPHANIE M. HINDS
Acting United States Attorney

Dated: 6/1/2021



MAIA PEREZ
Assistant United States Attorney

I have fully explained to my client all the rights that a criminal defendant has and all the terms of this Agreement. In my opinion, my client understands all the terms of this Agreement and all the rights my client is giving up by pleading guilty, and, based on the information now known to me, my client's decision to plead guilty is knowing and voluntary.

Dated: 6/1/2021



PETER LEEMING
Attorney for Defendant